





December 26, 2017

FCC

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Dear FCC:

We are a small company that has been in business for 28 years, and in matters that are critical to our future, it is important that you might understand our strategy that will affect us.

We have about 270 internet customers that we serve in the Santa Barbara and San Luis Obispo counties in California. We serve the rural areas of these counties. So this would be considered rural, even though these counties have large populations in their larger cities, which we do not serve. These customers are not served by cable companies. Some of these people can get telephone DSL or T1 service. We offer speeds up to 50Mbps up and down symmetrical.

Frequencies are critical for us to provide these services, and the 3650-3700 MHz bands are critical for the success of broadband into these rural areas. Obviously, if these larger telephone or cable companies wanted to serve these areas, they would have made that investment to date.

The future of this service is critical in how the geographic area of PALS to an area larger than census tracts will reduce our ability to make competitive bids at the PAL auction. The ability for us to grad such a larger area than we can use or plan to use seems to unserved the broadband market for these rural areas.

With the benefits of 100 megahertz of mid-band spectrum is beneficial to the broadband users in rural America. And smaller companies like ours, are capable providing this service so much better than existing cable or telco companies. We can and will invest in the technology to the benefit of our customers. The rural customers who do not have access to fast internet want us to continue to provide this service. And we need rules that make this accessible.

We oppose the proposals to increase the size of PALS or lengthen the terms of the licenses.

Dan Rudul

Sincerely,

Dan Rudnick